

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

---

In re:

FREE SPEECH SYSTEMS, LLC,

Debtor.

---

)  
)  
) Chapter 11 (Subchapter V)  
)  
) Case No. 22-60043 (CML)  
)  
)  
)  
)

**ORDER PURSUANT TO BANKRUPTCY CODE  
SECTIONS 105(a) AND 1112(b) CONVERTING THE DEBTOR'S  
CHAPTER 11 CASE TO A CASE UNDER CHAPTER 7 OF THE BANKRUPTCY CODE**

---

Upon the motion (the "Motion")<sup>12</sup> of Connecticut Families for entry of this order:

(a) authorizing and approving the conversion of the FSS Case to a case under chapter 7 of the Bankruptcy Code and (b) granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the Amended Standing Order; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and this Court having found that notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing");

---

<sup>12</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Motion.

and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted, and the FSS Case is hereby converted to a case under chapter 7 of the Bankruptcy Code.

2. Other than as modified herein, all orders of this Court entered in the FSS Case on or before entry of this Order shall remain in full force and effect and shall survive the conversion of the FSS Case and be binding on any subsequently appointed chapter 7 trustee.

3. Upon appointment of a chapter 7 trustee, the Debtor shall turn over to such trustee all records and property of the estate remaining in the Debtor's custody and control.

4. All estate professionals shall be required to submit final fee applications for allowance and payment of all fees and expenses incurred during the FSS Case through the date of this Order by no later than twenty-one days (21) days following such date. Any objections to such final fee applications shall be filed by no later than 4:00 pm (prevailing Central Time) by no later than fourteen (14) days after such filing deadline. No hearing shall be necessary with respect to those final fee applications for which no objection has been filed. If an objection is timely filed, then a hearing on the contested fee application(s) shall be scheduled with the Court and noticed on the docket by the estate professional(s) subject to the contested fee application(s).

5. The Debtor is hereby authorized and empowered to take any and all steps necessary and appropriate to effectuate the terms of this Order.

6. To the extent applicable, Rules 6004(h) and 6006(d) of the Federal Rules of Bankruptcy Procedure are waived and this Order shall be effective and enforceable immediately upon entry.

7. This Court retains exclusive jurisdiction with respect to all matters, claims, rights or disputes arising from or related to the implementation, interpretation, and enforcement of this Order and any other orders entered in these cases.

Dated: \_\_\_\_\_, 2024  
Houston, Texas

---

CHRISTOPHER LOPEZ  
UNITED STATES BANKRUPTCY JUDGE